

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

UNITED STATES OF AMERICA

V.

NO. 3:22-MJ-323-BK

JESUS PEREZ FUENTES

**MOTION FOR PRETRIAL DETENTION**

The United States moves for pretrial detention of defendant, **Jesus Perez Fuentes**, pursuant to 18 U.S.C. §3142(e) and (f).

1. Eligibility of Case. This case is eligible for a detention order because the case involves (check all that apply):

- Crime of violence (18 U.S.C. §3156);
- Maximum sentence life imprisonment or death
- 10 + year drug offense
- Felony, with two prior convictions in above categories
- Serious risk defendant will flee
- Serious risk obstruction of justice
- Felony involving a minor victim
- Felony involving a firearm, destructive device, or any other dangerous weapon
- Felony involving a failure to register (18 U.S.C. § 2250)

2. Reason for Detention. The Court should detain the defendant because there are no conditions of release which will reasonably assure (check one or both):

the defendant's appearance as required  
 Safety of any other person and the community

3. Rebuttable Presumption. The United States will/will not invoke the rebuttable presumption against defendant because (check one or both):

Probable cause to believe the defendants committed 10+ year drug offense or firearms offense, 18 U.S.C. §924(c)  
 Probable cause to believe defendant committed a federal crime of terrorism, 18 U.S.C. §2332b(g)(5)  
 Probable cause to believe defendant committed an offense involving a minor, 18 U.S.C. §§1201, 2251  
 Previous conviction for "eligible" offense committed while on pretrial bond

Pursuant to Fed. R. Crim. P. 32.1(a)(6) and 18 U.S.C. § 3142(a), the government opposes any motion by the defendant for release pending trial. The defendant cannot show by clear and convincing evidence that he is not a flight risk or a danger to the community. See Fed. R. Crim. P. 32.1(a)(6). The government asserts that there is no condition or combination of conditions that would reasonably assure the defendant's presence at trial. 18 U.S.C. § 3142(a)(3). For these reasons, the government asks that the defendant be detained pending trial in this case.

4. Time For Detention Hearing. The United States requests the Court conduct the detention hearing,

At first appearance

After continuance of 3 days (not more than 3).

DATED this 31st day of March 2022.

Respectfully submitted,

CHAD E. MEACHAM  
UNITED STATES ATTORNEY

*/s/ L. Rachael Jones*

L. RACHAEL JONES  
Assistant United States Attorney  
State Bar of Texas No. 24032481  
1100 Commerce Street, Third Floor  
Dallas, Texas 75242-1699  
Telephone: 214-659-8600  
Email: rachael.jones@usdoj.gov

CERTIFICATE OF SERVICE

I hereby certify that I filed this motion with the United States District Clerk for the Northern District of Texas and a copy will be provided to the defense counsel of record in accordance with the Federal Rules of Criminal Procedure. Certified on this 31st day of March 2022.

*/s/ L. Rachael Jones*

L. RACHAEL JONES  
Assistant United States Attorney